

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

In re:

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Case No.

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Chapter

Debtor

NOTICE OF MOTION

_____ has filed papers with the court to _____.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not wish the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before _____, you or your attorney must:

- ☐ Send to the parties listed below at least 14 days written notice of a hearing, which may be set on any regularly-scheduled motion day of the judge assigned to the case. If necessary, you may obtain a list of such dates by telephone from the clerk's office. The original and one copy of the notice must be filed with the clerk, accompanied by a motion day cover sheet, a copy of which may be obtained from the clerk. If you are not represented by an attorney, you may instead file with the clerk a written request for hearing. If you mail your request for hearing to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. The address of the clerk's office is as follows:

Clerk of Court
United States Bankruptcy Court
200 S. Washington Street
Alexandria, Virginia 22314

You will be notified by the clerk of the hearing date and will be responsible for sending notice of hearing to the parties listed below.

- ☐ File with the court, at the address shown above, a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). **Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing.** If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. You must **also** mail a copy to the persons listed below.

- ☐ Attend the hearing scheduled to be held on _____ at _____ o'clock _____.m. in Courtroom _____, United States Bankruptcy Court, 200 South Washington Street, Alexandria, Virginia 22314. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- ☐ A copy of any written response must be mailed to the following persons:
- ☐ _____

- ☐ _____

- ☐ United States Trustee, Region 4
115 South Union Street, Suite 210
Alexandria, VA 22314

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: _____

Signature, name, address and telephone number
of person giving notice:

Virginia State Bar No. _____
Counsel for _____

Certificate of Service

I hereby certify that I have this _____ day of _____, 2017, mailed or hand-delivered a true copy of the foregoing Notice of Hearing to the parties listed on the attached service list.

Amex
Po Box 297871
Fort Lauderdale, FL 33329-0000

Amex Dsnb
Po Box 8218
Mason, OH 45040-0000

amex plat
11445 SHERWOOD FOREST WAY
FAIRFAX, VA 22030-0000

apple federal credit union
11445 SHERWOOD FOREST WAY
FAIRFAX, VA 22030-0000

Chase Card
Po Box 15298
Wilmington, DE 19850-0000

discover
11445 SHERWOOD FOREST WAY
FAIRFAX, VA 22030-0000

Discover Fin Svcs Llc
Po Box 15316
Wilmington, DE 19850-0000

gale m ola
11445 SHERWOOD FOREST WAY
FAIRFAX, VA 22030-0000

macy's amex
11445 SHERWOOD FOREST WAY
FAIRFAX, VA 22030-0000

paypal
11445 SHERWOOD FOREST WAY
FAIRFAX, VA 22030-0000

Progressive Mgmt Syste
1521 W. Cameron Ave
West Covina, CA 91790-0000

Prosper Marketplace In
101 2nd St Fl 15
San Francisco, CA 94105-0000

Sears/cbna
Po Box 6283
Sioux Falls, SD 57117-0000

Syncb/dkdc
P.o. Box 965005
Orlando, FL 32896-0000

usaa federal checking bank
11445 SHERWOOD FOREST WAY
FAIRFAX, VA 22030-0000

Uaaa Savings Bank
10750 Mc Dermott
San Antonio, TX 78288-0000

Volvo Car Financial Sv
1 Volvo Dr
Rockleigh, NJ 07647-0000

Volvocarlse
Po Box 45144
Jacksonville, FL 32231-0000

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

ALEXANDRIA DIVISION

IN RE:

MARK OLA

Debtor,

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**Case No. 17-10911-BFK
Chapter 7**

**MOTION TO REOPEN CASE TO FILE CERTIFICATION OF COMPLETION OF
FINANCIAL MANAGEMENT COURSE**

Mark Ola, by counsel, hereby moves this Court to reopen his Chapter 7 case for the purpose of filing his certification of completion of a post-petition financial management course, and respectfully states as follows:

1. The Debtor filed a voluntary petition under Chapter 7 on March 21, 2017.
2. Debtor's case was closed without discharge on September 27, 2017 for failure to file a Certificate of Completion of Financial Management Course.
3. Debtor is going through a contested divorce which has taken up much of his attention and time. Debtor was able to complete the post-petition instruction course on personal financial management on October 8, 2017.

WHEREFORE, Debtor respectfully requests that this Court reopen Debtor's case and allow him to file the certification of completion of the financial management course.

Respectfully Submitted,

/s/ Ashvin Pandurangi

Ashvin Pandurangi, Bar #86966

AP Law Group, PLC

7777 Leesburg Pike, Suite 402N

Falls Church, VA 22043

Tel: (571) 969-6540

Fax: (571) 699-0518

Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that I have this 10th day of October, 2017 served a copy of the foregoing Motion to Reopen Case by electronic mail and ECF to Jack Frankel on behalf of the U.S. Trustee, Judy A. Robbins, and to the Chapter 7 Trustee, Donald F. King.

Jack Frankel on behalf of U.S. Trustee Judy A. Robbins, 11
jack.i.frankel@usdoj.gov, USTPRegion04.ax.ecf@usdoj.gov

Donald F. King
Kingtrustee@ofplaw.com

/s/ Ashvin Pandurangi
Ashvin Pandurangi